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Attorneys for Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S DEPARTMENT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CANNON HUGH DANIELS, deceased; decedent's wife, ARIELE ROSTAMO aka ARIELE NELSON; decedent's mother, SUSAN ADELL DANIELS; and decedent's father, JOSEPH ALBERT DANIELS, IV, individually,

CASE NO. 2:20-cv-00445 JAM EFB

**AMENDED STIPULATION FOR DISMISSAL
WITH PREJUDICE OF DEFENDANTS
SCOTT R. JONES AND SACRAMENTO
COUNTY DEPARTMENT OF HEALTH
SERVICES AND ORDER**

Complaint Filed: 02/26/2020

COUNTY OF BUTTE; BUTTE COUNTY SHERIFF'S DEPARTMENT; KORY L. HONEA, individually and in his official capacity as Butte County Sheriff; COUNTY OF SACRAMENTO; SACRAMENTO COUNTY SHERIFF'S DEPARTMENT; SCOTT R. JONES, individually and in his official capacity as Sacramento County Sheriff; OROVILLE HOSPITAL; WELLPATH MANAGEMENT, INC.; SACRAMENTO COUNTY DEPARTMENT of HEALTH SERVICES; and DOES I to 50, Inclusive,

Defendants.

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1 IT IS HEREBY STIPULATED and agreed by and between Plaintiffs and Defendants COUNTY
2 OF SACRAMENTO; SACRAMENTO SHERIFF'S DEPARTMENT that Defendants SCOTT R.
3 JONES and SACRAMENTO COUNTY DEPARTMENT OF HEALTH SERVICES be dismissed from
4 this action in their entirety with prejudice pursuant to Fed. R. Civ. P. 41(a).

5 IT IS FURTHER STIPULATED and agreed that in exchange for said dismissals, Defendant
6 COUNTY OF SACRAMENTO; SACRAMENTO SHERIFF'S DEPARTMENT shall make available
7 and produce SCOTT R. JONES and any employees, officers, or agents of SACRAMENTO COUNTY
8 DEPARTMENT OF HEALTH SERVICES involved with the deceased or with the management and/or
9 control of the deceased while he was incarcerated in the Sacramento jail for his/her deposition(s) and/or
10 at trial, if necessary, without the requirement of Plaintiff formally serving him/her by deposition and/or
11 trial subpoena.

12 IT IS FURTHER STIPULATED that each party is to bear their own fees and costs, including all
13 attorneys' fees as to these dismissed Defendant's only.

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15 **IT IS SO STIPULATED.**

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17 Dated: September 3, 2020

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A PROFESSIONAL CORPORATION

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19 By /s/ David R. Norton

20 Carl L. Fessenden
21 David R. Norton
22 Attorneys for Defendants COUNTY OF
23 SACRAMENTO, SACRAMENTO
24 COUNTY SHERIFF'S DEPARTMENT;
SCOTT R. JONES, SACRAMENTO
COUNTY DEPARTMENT OF HEALTH
SERVICES

25
26 Dated: September 3, 2020

ANDREW E. BAKOS & ASSOCIATES, P.C.

27 By /s/ Andrew E. Bakos (as authorized on 9/3/20)

28 Andrew E. Bakos
Attorney for Plaintiffs

ORDER

Having reviewed the Stipulation of the parties, and good cause appearing, IT IS HEREBY ORDERED that the above-captioned action is dismissed with prejudice as to Defendants SCOTT R. JONES and SACRAMENTO COUNTY DEPARTMENT OF HEALTH SERVICES, the named Defendants identified in the Stipulation. Each party is to bear their own fees and costs, including all attorneys' fees as to these dismissed defendants only.

Dated: September 3, 2020

/s/ John A. Mendez

The Honorable John A. Mendez
United States District Court Judge